

Message

**From:** Khan, Annie (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MASSMAIL-01/CN=RECIPIENTS/CN=ANNIE.KHAN]  
**Sent:** 10/27/2010 8:39:46 PM  
**To:** Salemi, Charles (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MassMail-01/cn=Recipients/cn=Charles.Salemi]  
**CC:** Nassif, Julianne (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MassMail-01/cn=Recipients/cn=Julianne.Nassif]  
**Subject:** FW: Com. v. [REDACTED] - request for testing documents

I will be the problem child. Haha

How should I address this matter? The discovery packet has already been sent.

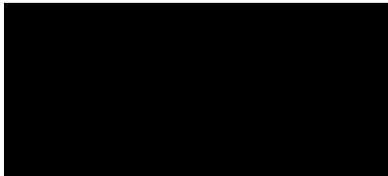
Annie

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**From:** Gabby McLane [REDACTED]  
**Sent:** Monday, October 25, 2010 12:57 PM  
**To:** Khan, Annie (DPH)  
**Cc:** Greene, Lauren (DAA)  
**Subject:** Com. v. Hodge - request for testing documents

Dear Annie Khan,

This is Gabriela McLane, I'm a legal intern in Major Felony. I'm working with ADA Greene on this case. The defense attorney requested a list of discovery items. There are a few specific documents defense counsel asks for. Here's the list, let me know if your policy allows you to turn these over to us:



1. Any and all documents or log entries pertaining to chain of custody of the alleged controlled substances, including, but not limited to drug receipts and evidence control cards (specific to the charged narcotics).
2. Notice as to and the make and models of all instruments and balances used in the analyses and weighing of the alleged controlled substances.
3. Lot numbers of all chemicals, re-agents and standards used in the analyses of alleged controlled substances (including the names of the manufacturer(s) of all such material and the expiration dates of the materials).
4. Analytical data from testing and analyses of all standards used.
5. Where applicable, notice as to nature of sampling plan(s), (statistical or non-statistical), and sampling procedure(s) employed in the connection with the analyses of the alleged controlled substance and documentation of all calculations made in generation and implementation of such plan(s) and procedure(s).

*Protocols, quality control, accreditation, proficiency testing and analysts' CV's.*

6. Protocols in place relative to the testing and analyses performed on the alleged controlled substances.
7. Quality control manuals for all instruments, balances, solution and reference standards used in connection with the analyses of the alleged controlled substances.
8. Records of quality control / quality assurance work performed on all instruments, balances, solutions and reference standards used in connection with the analyses and weighing of the alleged controlled substances, including records of testing, calibration, cleaning and other routine maintenance and all repairs.
9. Accreditation (ASCLD or other) status of laboratory, including results of most recent accreditation-related audit.
10. Records of proficiency testing performed within the past three years on all laboratory personnel involved in the analyses and or weighing of the alleged controlled substances.
11. Curriculum vitae of all laboratory personnel involved in the analyses or weighing of the alleged controlled substances.

*Notice re: analysts' access to police reports:*

12. Notice as to whether any police reports prepared in this case were made available to any laboratory personnel involved in the testing of the alleged controlled substances and, if so, notice as to which reports were provided to the laboratory.

Your attention in this matter is greatly appreciated. Please let me know if you have any questions. I can also be reached at 267.242.9896.

Gabriela McLane  
MFEL Legal Intern